

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE GENERAL ELECTRIC SECURITIES
LITIGATION

19 Civ. 1013 (DLC)

NOTICE OF MOTION

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that upon the annexed Declaration of Blake T. Denton, dated September 27, 2019, the exhibits attached thereto, and the accompanying Memorandum of Law, the undersigned hereby moves this Court on behalf of Defendants General Electric Company, John L. Flannery, Jamie S. Miller, Jan R. Hauser, Russell Stokes, Chuck Nugent, Scott Strazik, and Joe Mastrangelo, before the Honorable Denise L. Cote, in Courtroom 18B of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, for an Order dismissing the Second Amended Complaint with prejudice pursuant to Rules 9(b) and 12(b)(6) of the Federal Rules of Civil Procedure, and the Private Securities Litigation Reform Act, and granting such further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Order entered in this action on September 4, 2019 [Dkt. 82], Lead Plaintiff's opposition papers shall be served on or before October 25, 2019, and Defendants' reply papers shall be served on or before November 8, 2019.

Dated: New York, New York
September 27, 2019

Respectfully submitted,

LATHAM & WATKINS LLP

By: /s/ Miles N. Ruthberg

Miles N. Ruthberg
Blake T. Denton
885 Third Avenue
New York, New York 10022
(212) 906-1200
miles.ruthberg@lw.com
blake.denton@lw.com

Sean M. Berkowitz (*pro hac vice*)
330 North Wabash Avenue, Suite 2800
Chicago, Illinois 60611
(312) 876-7700
sean.berkowitz@lw.com

William J. Trach (*pro hac vice*)
200 Clarendon Street
Boston, Massachusetts 02116
(617) 948-6000
william.trach@lw.com

Sarah. A. Tomkowiak (*pro hac vice*)
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004
(202) 637-2200
sarah.tomkowiak@lw.com

*Attorneys for Defendants General Electric
Company, John L. Flannery, Jamie S.
Miller, Jan R. Hauser, Russell Stokes,
Chuck Nugent, Scott Strazik, and
Joe Mastrangelo*